

4. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 4 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

5. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 5 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

6. The allegations contained in Paragraph 6 of Plaintiffs' Complaint are denied.

7. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 7 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

8. This Defendant denies any liability directed to him in Paragraph 8 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 8 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

9. This Defendant admits that this Court has subject matter jurisdiction over the claims alleged by the Plaintiffs. However, this Defendant denies such claims.

10. This Defendant admits that venue is proper in this district, but denies liability for any claims in Plaintiffs' Complaint.

11. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 11 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

12. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 12 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

13. This Defendant admits that Hannover executed promissory notes with certain note holders. However, this Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 13 of Plaintiffs' Complaint. Therefore, this Defendant neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

14. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 14 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

15. This Defendant asserts that the Promissory Note Agreements speak for themselves. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 15 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

16. This Defendant asserts that the Promissory Note Agreements speak for themselves. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 16 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

17. This Defendant denies that he solicited Plaintiffs' to enter into a Promissory Note Agreement. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 17 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

18. To the extent the allegations contained in Paragraph 18 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 18 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

19. To the extent the allegations contained in Paragraph 19 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 19 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

20. To the extent the allegations contained in Paragraph 20 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 20 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

21. To the extent the allegations contained in Paragraph 21 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant further assert that the Promissory Note Agreements speak for themselves. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 21 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

22. To the extent the allegations contained in Paragraph 22 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient

information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 22 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

23. To the extent the allegations contained in Paragraph 23 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 23 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

24. To the extent the allegations contained in Paragraph 24 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 24 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

25. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 25 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

26. To the extent the allegations contained in Paragraph 26 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 26 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

27. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 27 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

28. To the extent the allegations contained in Paragraph 28 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 28 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

29. To the extent the allegations contained in Paragraph 29 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 29 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

30. To the extent the allegations contained in Paragraph 30 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 30 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

31. To the extent the allegations contained in Paragraph 31 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 31 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

32. To the extent the allegations contained in Paragraph 32 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 32 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

33. To the extent the allegations contained in Paragraph 33 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 33 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

34. To the extent the allegations contained in Paragraph 34 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 34 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

35. To the extent the allegations contained in Paragraph 35 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 35 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

36. To the extent the allegations contained in Paragraph 36 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 36 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

37. To the extent the allegations contained in Paragraph 37 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 37 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

38. In response to Paragraph 38 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-37 of Plaintiffs' Complaint as fully set forth herein.

39. To the extent the allegations contained in Paragraph 39 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 39 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

40. To the extent the allegations contained in Paragraph 40 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 40 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

41. To the extent the allegations contained in Paragraph 41 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 41 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

42. To the extent the allegations contained in Paragraph 42 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 42 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

43. To the extent the allegations contained in Paragraph 43 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 43 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

44. To the extent the allegations contained in Paragraph 44 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 44 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

45. To the extent the allegations contained in Paragraph 45 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 45 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

46. To the extent the allegations contained in Paragraph 46 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 46 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

47. In response to Paragraph 47 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-46 of Plaintiffs' Complaint as fully set forth herein.

48. To the extent the allegations contained in Paragraph 48 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 48 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

49. To the extent the allegations contained in Paragraph 49 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 49 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

50. To the extent the allegations contained in Paragraph 50 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 50 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

51. To the extent the allegations contained in Paragraph 51 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 51 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

52. To the extent the allegations contained in Paragraph 52 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 52 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

53. In response to Paragraph 53 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-52 of Plaintiffs' Complaint as fully set forth herein.

54. To the extent the allegations contained in Paragraph 54 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 54 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

55. To the extent the allegations contained in Paragraph 55 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 55 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

56. To the extent the allegations contained in Paragraph 56 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 56 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

57. To the extent the allegations contained in Paragraph 57 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 57 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

58. In response to Paragraph 588 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-57 of Plaintiffs' Complaint as fully set forth herein.

59. To the extent the allegations contained in Paragraph 59 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 59 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

60. To the extent the allegations contained in Paragraph 60 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 60 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

61. To the extent the allegations contained in Paragraph 61 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 61 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

62. To the extent the allegations contained in Paragraph 62 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 62 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

63. To the extent the allegations contained in Paragraph 63 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 63 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

64. To the extent the allegations contained in Paragraph 64 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 64 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

65. In response to Paragraph 65 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-64 of Plaintiffs' Complaint as fully set forth herein.

66. To the extent the allegations contained in Paragraph 66 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 66 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

67. To the extent the allegations contained in Paragraph 67 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 67 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

68. To the extent the allegations contained in Paragraph 68 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 68 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

69. To the extent the allegations contained in Paragraph 69 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 69 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

70. To the extent the allegations contained in Paragraph 70 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 70 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

71. To the extent the allegations contained in Paragraph 71 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 71 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

72. In response to Paragraph 72 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-71 of Plaintiffs' Complaint as fully set forth herein.

73. To the extent the allegations contained in Paragraph 73 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 73 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

74. To the extent the allegations contained in Paragraph 74 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 74 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

75. To the extent the allegations contained in Paragraph 75 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 75 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

76. To the extent the allegations contained in Paragraph 76 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 76 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

77. In response to Paragraph 77 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-76 of Plaintiffs' Complaint as fully set forth herein.

78. To the extent the allegations contained in Paragraph 78 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 78 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

79. To the extent the allegations contained in Paragraph 79 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 79 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

80. To the extent the allegations contained in Paragraph 80 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 80 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

81. In response to Paragraph 81 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-80 of Plaintiffs' Complaint as fully set forth herein.

82. To the extent the allegations contained in Paragraph 82 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 82 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

83. To the extent the allegations contained in Paragraph 83 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 83 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

84. To the extent the allegations contained in Paragraph 84 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 84 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

85. In response to Paragraph 85 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-84 of Plaintiffs' Complaint as fully set forth herein.

86. This Defendant denies any liability directed to him in Paragraph 86 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 86 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

87. The allegations contained in Paragraph 87 of Plaintiffs' Complaint are denied.

88. The allegations contained in Paragraph 88 of Plaintiffs' Complaint are denied.

89. This Defendant denies that he is liable to the Plaintiffs under any theory of law and therefore denies that the Plaintiffs are entitled to any damages requested herein.

90. In response to Paragraph 90 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-89 of Plaintiffs' Complaint as fully set forth herein.

91. This Defendant denies any liability directed to him in Paragraph 91 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 91 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

92. The allegations contained in Paragraph 92 of Plaintiffs' Complaint are directed to a defendant other than this Defendant; therefore, no response of this Defendant is required.

93. The allegations contained in Paragraph 93 of Plaintiffs' Complaint are directed to a defendant other than this Defendant; therefore, no response of this Defendant is required.

94. This Defendant denies that he is liable to the Plaintiffs under any theory of law and therefore denies that the Plaintiffs are entitled to any damages requested.

95. In response to Paragraph 95 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1 through 94 of Plaintiffs' Complaint as fully set forth herein.

96. This Defendant denies any liability directed to him in Paragraph 96 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 96 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

97. To the extent the allegations contained in Paragraph 97 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 97 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

98. The allegations contained in Paragraph 98 of Plaintiffs' Complaint are directed to a Defendant other than this Defendant; therefore, no response of this Defendant is required.

99. To the extent the allegations contained in Paragraph 99 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 99 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

100. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

101. In response to Paragraph 101 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-100 of Plaintiffs' Complaint as fully set forth herein.

102. To the extent the allegations contained in Paragraph 102 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 102 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

103. This Defendant denies any liability directed to him in Paragraph 103 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 103 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

104. The allegations contained in Paragraph 104 of Plaintiffs' Complaint are directed to a Defendant other than this Defendant; therefore, no response of this Defendant is required.

105. The allegations contained in Paragraph 105 of Plaintiffs' Complaint are directed to a Defendant other than this Defendant; therefore, no response of this Defendant is required.

106. This Defendant denies any liability directed to him in Paragraph 106 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 106 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

107. The allegations contained in Paragraph 107 of Plaintiffs' Complaint are directed to a Defendant other than this Defendant; therefore, no response of this Defendant is required.

108. To the extent the allegations contained in Paragraph 108 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 108 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

109. To the extent the allegations contained in Paragraph 109 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 109 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

110. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

111. In response to Paragraph 111 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-110 of Plaintiffs' Complaint as fully set forth herein.

112. This Defendant denies any liability directed to him in Paragraph 112 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 112 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

113. This Defendant denies that the Promissory Notes at issue in this matter are securities and therefore denies the remaining allegations contained in Paragraph 113 of Plaintiffs' Complaint.

114. This Defendant denies that the Promissory Notes at issue in this matter are

securities and therefore denies the remaining allegations contained in Paragraph 114 of Plaintiffs' Complaint.

115. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

116. In response to Paragraph 116 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-115 of Plaintiffs' Complaint as fully set forth herein.

117. This Defendant denies any liability directed to him in Paragraph 117 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 117 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

118. To the extent the allegations contained in Paragraph 118 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 118 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

119. This Defendant admits that he is not a licensed broker-dealer in the state of Wisconsin. This Defendant is without sufficient information or knowledge to either admit or deny the remaining allegations contained in paragraph 119 of the Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

120. This Defendant admits that he is not a licensed broker-dealer in the state of Wisconsin. However, this Defendant denies any liability directed to him in Paragraph 120 of

Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 120 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

121. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

122. In response to Paragraph 122 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-121 of Plaintiffs' Complaint as fully set forth herein.

123. This Defendant denies any liability directed to him in Paragraph 123 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 123 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

124. To the extent the allegations contained in Paragraph 124 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 124 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

125. The allegations contained in Paragraph 125 of Plaintiffs' Complaint are directed to a Defendant other than this Defendant; therefore, no response of this Defendant is required.

126. To the extent the allegations contained in Paragraph 126 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 126 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations,

but demands strict proof thereof if deemed relevant.

127. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

128. In response to Paragraph 128 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-127 of Plaintiffs' Complaint as fully set forth herein.

129. This Defendant denies any liability directed to him in Paragraph 129 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 129 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

130. To the extent the allegations contained in Paragraph 130 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 130 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

131. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

132. In response to Paragraph 130 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-131 of Plaintiffs' Complaint as fully set forth herein.

133. This Defendant denies any liability directed to him in Paragraph 133 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 133 of Plaintiffs'

Complaint, but demands strict proof thereof if deemed relevant.

134. This Defendant denies any liability directed to him in Paragraph 134 of Plaintiffs' Complaint. Further, this Defendant asserts that the Promissory Notes speak for themselves. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 134 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

135. To the extent the allegations contained in Paragraph 135 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 135 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

136. To the extent the allegations contained in Paragraph 136 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 136 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

137. To the extent the allegations contained in Paragraph 137 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 137 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

138. To the extent the allegations contained in Paragraph 138 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in

Paragraph 138 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

139. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

140. In response to Paragraph 140 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-139 of Plaintiffs' Complaint as fully set forth herein.

141. This Defendant denies any liability directed to him in Paragraph 141 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 141 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

142. To the extent the allegations contained in Paragraph 142 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 142 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

143. To the extent the allegations contained in Paragraph 143 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 143 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

144. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

145. In response to Paragraph 145 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-144 of Plaintiffs' Complaint as fully set forth herein.

146. This Defendant denies any liability directed to him in Paragraph 146 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 146 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

147. To the extent the allegations contained in Paragraph 147 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 147 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

148. This Defendant admits that he is not a licensed broker-dealer in the state of California. However, this Defendant denies any liability directed to him in Paragraph 148 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 148 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

149. This Defendant admits that he is not a licensed broker-dealer in the state of California. However, this Defendant denies any liability directed to him in Paragraph 149 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 149 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

150. This Defendant denies that he is liable to Plaintiffs under any theory of law and

therefore denies the Plaintiffs are entitled to any damages requested.

151. In response to Paragraph 151 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-150 of Plaintiffs' Complaint as fully set forth herein.

152. This Defendant denies any liability directed to him in Paragraph 152 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 152 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

153. To the extent the allegations contained in Paragraph 153 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 153 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

154. This Defendant is without sufficient information or knowledge with which to admit or deny the allegations contained in Paragraph 154 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

155. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

156. In response to Paragraph 156 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-155 of Plaintiffs' Complaint as fully set forth herein.

157. This Defendant denies any liability directed to him in Paragraph 157 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant

neither admits nor denies the remaining allegations contained in Paragraph 157 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

158. To the extent the allegations contained in Paragraph 158 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 158 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

159. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

160. In response to Paragraph 160 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-159 of Plaintiffs' Complaint as fully set forth herein.

161. This Defendant denies any liability directed to him in Paragraph 161 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 161 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

162. To the extent the allegations contained in Paragraph 162 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 162 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

163. To the extent the allegations contained in Paragraph 163 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient

information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 163 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

164. To the extent the allegations contained in Paragraph 164 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 164 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

165. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

166. In response to Paragraph 167 of Plaintiff's Complaint, this Defendant restates and reincorporates by reference his previous responses to Paragraphs 1-165 of Plaintiffs' Complaint as fully set forth herein.

167. This Defendant denies any liability directed to him in Paragraph 167 of Plaintiffs' Complaint. Further, this Defendant asserts that the law speaks for itself. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 167 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

168. This Defendant denies any liability directed to him in Paragraph 168 of Plaintiffs' Complaint. Further, this Defendant asserts that the Promissory Notes speak for themselves. Thus, this Defendant neither admits nor denies the remaining allegations contained in Paragraph 168 of Plaintiffs' Complaint, but demands strict proof thereof if deemed relevant.

169. To the extent the allegations contained in Paragraph 169 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 169 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

170. To the extent the allegations contained in Paragraph 170 of Plaintiffs' Complaint are directed to this Defendant, said allegations are denied. This Defendant is without sufficient information or knowledge with which to admit or deny the remaining allegations contained in Paragraph 170 of Plaintiffs' Complaint and therefore neither admits nor denies said allegations, but demands strict proof thereof if deemed relevant.

171. This Defendant denies that he is liable to Plaintiffs under any theory of law and therefore denies the Plaintiffs are entitled to any damages requested.

172. The remaining allegations set forth in the Plaintiffs' Complaint constitute a prayer for relief to which this Defendant is not required to answer. Nevertheless, this Defendant denies that Plaintiffs are entitled to any of the damages and/or relief requested.

173. This Defendant denies each and every allegation contained in the Plaintiffs' Complaint not specifically admitted or qualified above.

SECOND DEFENSE

Pending further discovery and to avoid waiver, this Defendant asserts that the Complaint fails to state a claim against this Defendant upon which relief may be granted.

THIRD DEFENSE

The Complaint fails to allege fraud with particularity as to this Defendant.

FOURTH DEFENSE

The Complaint fails to state a claim against this Defendant under the Tennessee Consumer Protection Act.

FIFTH DEFENSE

The Promissory Notes signed by this Defendant are not securities or are exempt securities under governing law(s).

SIXTH DEFENSE

This Defendant asserts the defense of estoppel.

SEVENTH DEFENSE

Some or all of Plaintiffs' claims are barred by the applicable statute of limitations.

EIGHTH DEFENSE

This Defendant asserts any and all defenses applicable under the Tennessee Consumer Protection Act.

NINTH DEFENSE

This Defendant asserts that the law of Tennessee governs the promissory notes and the state security law claims alleged in Plaintiffs' Complaint.

TENTH DEFENSE

This Defendant asserts any and all defenses applicable under the Securities Act of 1933, the Securities Exchange Act of 1934, and the securities acts of Tennessee, Wisconsin and California.

ELEVENTH DEFENSE

This Defendant affirmatively alleges that the principles of comparative fault should govern any recovery in this case. Specifically, this Defendant alleges that Plaintiffs' recovery, if

any, should be compared against the finding of fault of Plaintiffs, if any, or any other entity or individual, if named, and that Plaintiffs' recovery should be reduced accordingly.

TWELFTH DEFENSE

The remaining allegations contained in Plaintiffs' Complaint, which have not heretofore been admitted, denied, or otherwise explained, are herein denied as if set forth individually and denied.

WHEREFORE, premises considered, this Defendant prays that he be dismissed with his costs. Failing dismissal, this Defendant requests a jury trial before six (6) persons on all issues properly joined by the pleadings. This Defendant further prays that a judgment be entered on his behalf for all costs and attorney's fees incurred in defending this action. This Defendant further prays for such other, further, and general relief to which he may be entitled in these premises.

Respectfully submitted,

**LEITNER, WILLIAMS, DOOLEY
& NAPOLITAN, PLLC**

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CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in the case by electronic notification through the Court's CM/ECF System or by placing a true and correct copy of same in the United States mail, postage prepaid, in a properly addressed envelope if any counsel of record or unrepresented party is not signed on to CM/ECF to the following address:

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This the 28th day of January, 2008.

By: s/ Thomas J. Dement II
Thomas J. Dement II